

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

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**THIS DOCUMENT RELATES TO:**

**DANIEL AND JENNIFER LOPER,  
Plaintiffs**

No. 12-md-2323 (AB)  
MDL No. 2323

**PETITION TO ESTABLISH  
ATTORNEY'S LIEN**

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**PETITION TO ESTABLISH ATTORNEY'S LIEN**

AND NOW come Petitioners, Sol Weiss and Larry Coben for Anapol Weiss ("Anapol Weiss"), pursuant to an executed Agreement for Legal Services ("Agreement") to petition and states as follows:

1. Petitioners are attorneys at law admitted to practice before the courts of Pennsylvania and file this Petition to establish a lien for attorneys' fees as set forth hereinafter.
2. On or about July 16, 2014, Plaintiffs, Daniel and Jennifer Loper retained Anapol Weiss pursuant to the Agreement to pursue a claim for injuries and damages allegedly caused by the National Football League's conduct associated with football-related concussions and head and brain injuries.
3. The Agreement, states in part, that: "I/we further agree that should I/we discharge said attorneys, my attorneys shall be entitled to immediate reimbursement of costs and disbursements and that I/we shall be liable to pay attorneys either a payment of a fee according to the above-agreed upon percentage of any settlement offers obtained prior to discharge or a

payment based upon time actually expended or reasonably estimated at the attorney's prevailing rates for work performed prior to discharge."

4. From the date Plaintiffs authorized Anapol Weiss to proceed on his behalf, Anapol Weiss actively and diligently investigated, prepared, and pursued Plaintiffs' claims, and took all steps necessary to prosecute those claims, including, but not limited to, correspondence and communications with the clients, preparation and review of clients' factual and legal circumstances, drafting and providing client updates, analyzing Plaintiffs' medical status and need for medical testing, and more.

5. On February 17, 2017, Anapol Weiss registered Plaintiffs for the NFL Concussion Settlement Program.

6. On February 23, 2023, Plaintiff notified Anapol Weiss that he had elected to discharge the firm and represent himself in the NFL Concussion Settlement Program.

7. Anapol Weiss did not commit any malfeasance or other improper action.

8. Anapol Weiss claims the right to have a lien for attorneys' fees and expenses established and enforced upon any sums to be derived from any settlement or judgment obtained or to be obtained by Plaintiff in this action.

WHEREFORE, the Petitioner prays:

1. That an attorney's lien be established;
2. That the amount of the lien be determined;
3. That the Court order that Anapol Weiss be entitled to enforce an attorney's lien against the proceeds to be derived from any settlement or judgment in this action;
4. That the Defendant or the Defendant's insurer be prohibited from paying to the Plaintiffs' any sums of money until said lien has been satisfied; and

5. For such other further relief as this Court deems just.

Dated: March 2, 2023

Respectfully submitted,

**ANAPOL WEISS**

/s/ Sol H. Weiss

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**CERTIFICATE OF SERVICE**

It is hereby certified that a true and correct copy of the foregoing Petition to Establish Attorney's Lien was served electronically via the Court's electronic filing system on the 2<sup>nd</sup> day of March 2023, upon all counsel of record.

s/ Sol H. Weiss  
Sol H. Weiss, Esquire